UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

SE-5J

February 19, 2010

Steve Garbaciak, Jr. P.E.
Vice-President
ARCADIS – BBL Inc.
30 West Monroe, Suite 1710
Chicago, Illinois 60603-2404

Re: Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Former Plainwell Impoundment Time-Critical Removal Action
Final Construction Completion Report Dated January 2010

Dear Mr. Garbaciak:

The United States Environmental Protection Agency (U.S. EPA), after consultation with the Michigan Department of Environmental Quality (MDEQ) and Trustees (the State of Michigan, the National Oceanic and Atmospheric Administration of the U.S. Department of Commerce, and the U. S. Fish and Wildlife Service of the U. S. Department of the Interior), has completed its review of the revised Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site-Former Plainwell Impoundment Time Critical Removal Action-Final Construction Completions Report (Report) dated January 2010. Enclosed are U.S. EPA's comments on the Report.

Pursuant to Paragraph 74 of the Allied Paper/Portage Creek/Kalamazoo River Superfund Site Administrative Settlement Agreement and Order on Consent for Removal Action (Docket No. V-W-07-863), U.S. EPA approves the report with the modifications found in the enclosure. Within 15 days of receipt of this letter, please submit a revised final Report making the modifications specified by the enclosure.

If you have any questions or concerns regarding these comments, please do not hesitate to contact me at (312) 353-8360.

Sincerely,

Sam Borries
On-Scene Coordinator

Enclosure

cc: Mike Ribordy, USEPA
Jim Saric, USEPA
Leslie Kirby-Miles, USEPA
Paul Bucholtz, MDEQ
Sharon Hanshue, MDNR
Lisa Williams, USFWS
Todd Goeks, NOAA

Enclosure

Section 1.3, Page 1-4 – Keep Objective 4 as originally written in the Design Report:

4. Removal of PCB-contaminated soil in excess of 4 mg/kg PCBs from the river's northern floodplain on or near residential properties upstream of US 131, to the extent that the floodplain can be reasonably accessed.

Section 3.5, Pages 3-17 through 3-18 – Replace the background text with the following:

3.5 Soil and Sediment Removal

Background

As described in Section 1.2 of the Design Report, the former Plainwell Impoundment has been the focus of an extensive series of investigations by ARCADIS, MDNR, and USEPA since 1993. The most recent PCB data were generated during a sampling effort conducted by ARCADIS in 2006. A variety of targeted studies of the impoundment were also conducted in 2005 and 2006 to further characterize Site topography, bank stability/disposition, flow hydrodynamics, equipment accessibility, and habitat quality. The results of these investigations were used to define the horizontal and vertical extents of soil excavation. The results of the delineation process were summarized in section 2.1 and Drawings SR-1.1 through SR-1.8 of the Design Report. Soil excavation was performed to these extents and confirmed complete per the requirements of the Design Report.

Section 3.5.1.1 – Confirmation Sampling, Page 3-20 – Replace the text in this section with the following:

3.5.1.1 Confirmation Sampling

Completion of soil excavation to the extent defined in the Design Report was confirmed through PCB soil confirmation sampling for bank, floodplain, upland areas, and Island 3. The purpose of the confirmation sampling was to verify that no unacceptable PCB concentrations were left behind within the excavation boundaries. Therefore, confirmation sampling affected the depth of excavation, but did not affect the lateral extent of removal which was determined before completion of the Design Report using historical data. The PCB sampling performance....

Section 4.5 - Post-Construction Sediment Sampling, Pages 4-3 through 4-4 – Replace the first two paragraphs of this section with the following:

As discussed in Section 2.3.6 and in Section 5.6.1 of the Design Report (ARCADIS BBL 2007a), sediment sampling was performed at the end of each construction season to document PCB concentrations in the sediment removal areas. This is because confirmation in sediment removal areas consisted only of surface elevation monitoring, rather than confirmation sampling of PCB concentrations in sediments. Post-construction

samples provided useful data to document and monitor pre- and post-construction changes in PCB concentrations in the sediment removal areas.